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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
17 LLC,

18 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF JEFF NARDINELLI
IN SUPPORT OF WAYMO LLC'S OFFER
OF PROOF WITH RESPECT TO
WAYMO'S DEVELOPMENT EXPENSES**

1 I, Jeff Nardinelli, hereby declare as follows.

2 1. I am a member of the bar of the State of California and an associate with Quinn
3 Emanuel Urquhart & Sullivan, LLP, counsel for Plaintiff Waymo LLC ("Waymo"). I make this
4 declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and
5 would testify competently as follows.

6 2. Attached as Exhibit 1 is a true and correct excerpted copy of the August 15, 2017
7 deposition of Jeff Holden.

8 3. Attached as Exhibit 2 is a true and correct excerpted copy of the August 11, 2017
9 deposition of John Bares.

10 4. Attached as Exhibit 3 is a true and correct copy of document produced by Uber in
11 this case bearing Bates number UBER00006451.

12 5. Attached as Exhibit 4 is a true and correct copy of document produced by Uber in
13 this case bearing Bates number UBER00059911.

14 6. Attached as Exhibit 5 is a true and correct excerpted copy of the August 16, 2017
15 deposition of Benjamin Ingram.

16 7. Attached as Exhibit 6 is a true and correct excerpted copy of the September 26,
17 2017 deposition of Dr. Lambertus Hesselink.

18 8. Attached as Exhibit 7 is a true and correct copy of a document produced by Waymo
19 in this case bearing Bates number WAYMO-UBER-00008167.

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1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct.

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4 DATED: January 26, 2018

/s Jeff Nardinelli

Jeff Nardinelli

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8 **SIGNATURE ATTESTATION**

9 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
10 filing of this document has been obtained from Jeff Nardinelli.

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12 */s/ Charles K. Verhoeven*

13 Charles K. Verhoeven
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